

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

(1) PHILIP SANDERS, an Individual)
and Husband and Next of Kin of)
BRENDA JEAN SANDERS, deceased,)
)
Plaintiff,)

vs.)

Case No.: 17-CV-492-JED-CDL

(1) CREEK COUNTY BOARD OF)
COUNTY COMMISSIONERS, and)
(2) SHERIFF BRET BOWLING, in)
his official capacity as Creek County)
Sheriff, and (3) TURN KEY HEALTH)
CLINICS, a limited liability company,)
)
Defendants.)

**DEFENDANT TURN KEY HEALTH CLINICS, LLC'S UNOPPOSED
MOTION TO FILE DOCUMENTS UNDER SEAL**

COMES NOW, Defendant Turn Key Health Clinics, LLC (“Defendant” or “Turn Key”), and respectfully requests leave to file exhibits to its forthcoming Motion for Summary Judgment¹ under seal. Defendant desires to attach documents and materials that have been produced in discovery and identified as “Confidential” pursuant to the Stipulated Protective Order entered in this case (Doc. No. 36), as exhibits to its Motion for Summary Judgment. Specifically, Defendant anticipates that it will rely upon its policies and procedures and internal records and materials as exhibits to its Motion for Summary Judgment in support of its arguments and positions contained therein. Defendant contends that these materials are sensitive and private or otherwise proprietary in nature and are the product of significant time and investment. Accordingly, Defendant has valid concerns about making such materials a matter of public record by not filing under seal. Counsel for Plaintiff has no objection to the relief sought herein.

¹ Dispositive motions are currently due by June 9, 2021. However, the dispositive motion

WHEREFORE, Turn Key respectfully request the Court grant this motion and enter an order authorizing it to file certain exhibits to its Motion for Summary Judgment under seal.

Respectfully submitted,

/s/ Sean P. Snider

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CERTIFICATE OF SERVICE

I hereby certify that on **June 7, 2021**, a true and correct copy of the above and foregoing was electronically transmitted to the Clerk of this Court using the ECF System for filing and transmittal of a Notice of Electronic Filing and to all ECF registrants who have appeared in this case.

/s/ Sean P. Snider

Sean P. Snider

deadline is currently the subject of a pending Motion. *See* Doc. Nos. 165, 166.